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Attorney for Defendant
RUSTY LACSINA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(Hon. Anthony J. Battaglia)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RUSTY LACSINA, (1)

Defendant.

CASE NO. 16-CR-1462-AJB-1

**DEFENDANT LACSINA'S EX
PARTE MOTION TO COMPEL U.S.
PROBATION TO PRODUCE
PSYCHOLOGICAL EVALUATIONS**

Date: TBD

Time:

COMES NOW Defendant RUSTY LACSINA, by and through his attorney, Patrick Q. Hall, and respectfully seeks a court order compelling the United States Probation Office to provide copies of any sex offender evaluations of Mr. LACSINA to the defense. In California in 2021, a sex offender evaluation involved a comprehensive risk assessment using a set of validated instruments to predict the likelihood of re-offense. Mr. LACSINA's current probation officer, Ms. Jennifer Avila has stated that probation is in possession of such an evaluation from 2021.

Mr. LACSINA requests these records to assist in the intake process by The Way Back rehabilitation center, to assess whether he is a good candidate for their program. The Way Back is a 30-bed residential alcohol and drug treatment program for men, with

1 28 residential beds and 2 withdrawal management beds. The program is designed to pave
2 the way for men to achieve long-term recovery. The director of the program has
3 specifically requested these types of evaluations before he will consider Mr. LACSINA
4 as a candidate for residential treatment.

5 Accordingly, Mr. LACSINA requests that the court order U.S. Probation to
6 produce any such reports it possesses to defense counsel.

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8 Respectfully submitted,

9 Dated: October 28, 2025

s/Patrick Q. Hall
10 PATRICK Q. HALL
11 Attorney for Defendant
12 RUSTY LACSINA
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